

UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND

RE: MIRNA FERLA
Debtor

BK. NO.: 21-10850
Chapter 13

APPLICATION FOR FINAL COMPENSATION

NOW comes the **JACK D. PITTS**, as attorney of record for the Debtor, **Mirna Ferla**, in the above-entitled matter, before this Honorable Court and moves to be compensated for his legal services.

In support of said Motion, legal counsel states as follows:

1. The Debtor filed pro se' for Chapter 7 Relief on November 29, 2021.
2. The Debtor's case was converted on December 13, 2021 to a Chapter 13.
3. The Debtor agreed to pay legal fees in the amount of \$4,000.00 for conversion and Chapter 13 representation.
4. Prior to filing the Debtor paid her attorney \$1,750.00, leaving a \$2,250.00 balance.
5. In the course of representing the Debtor between the dates of December 1, 2021 to present, Debtor's counsel:
 - a. Completed missing Schedules and Statements
 - b. Prepared Conversion documents
 - c. Prepared Schedules and Statements
 - d. Prepared amended schedules
 - e. Prepared a Chapter 13 Plan
 - f. Attended a 341 hearing

- g. Defended the Debtor on a Motion For Relief from Stay
 - h. Filed Motions to extend time due to the Debtor
 - i. Amended Chapter 13 Plan one time
 - j. Prepared and Filed necessary Motions to Continue hearings
 - k. Aided in the preparation of Loss Mitigation packages for the two real properties owned by Debtor.
 - l. Performed all regular and necessary duties
6. The Debtor's case was dismissed as the result of Debtor's inability to obtain a loan modification and a short sale, and not due to her attorney.
7. Legal Counsel for the Debtor performed legal services in excess of what is usually required to have a Chapter 13 Plan confirmed.

WHEREFORE, Legal counsel for the Debtor prays that this Court will grant the relief requested and authorize the Chapter 13 Standing Trustee authority to pay the sum of \$2,250.00 out of those monies paid into his trust account prior to refunding those unused funds back to the Debtor.

Mirna Ferla
By her Attorney,

/s/ Jack D. Pitts

Jack D. Pitts, Esq., #3397
PITTS & BURNS
635 Killingly St.
Johnston, RI 02903
(401) 453-2800

DATED: July 14, 2022

NOTICE

Within twenty-one (21) days after service, if served electronically, as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if served by mail or other excepted means specified, any party against whom such paper has been served, or any other party who objects to the relief sought, shall serve and file an

objection or other appropriate response to said paper with the Bankruptcy Court Clerk's Office, 380 Westminster Street, 6th Floor, Providence, RI 02903, (401) 626-3100. If no objection or other response is timely filed, the paper will be deemed unopposed and will be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE

On the 14th day of July, 2022, a true and accurate copy of the within Motion and attachments was served:

electronically to:

John Boyajian

john@bhrlaw.com, martha@bhrlaw.com

Gary L. Donahue

ustpreion01.pr.ecf@usdoj.gov

Jason David MacKeen on behalf of Creditor U.S. Bank Trust National Association, not in its individual capacity, but solely as Trustee of LSF9 Master Participation Trust
bankruptcyNE@orlans.com, ANHSEorlans@InfoEx.com

Jason David MacKeen on behalf of Creditor U.S. Bank Trust National Association, not in its individual capacity, but solely as Trustee of LSRMF MH Master Participation Trust II
bankruptcyNE@orlans.com, ANHSEorlans@InfoEx.com

Jack D. Pitts on behalf of Debtor Mirna Ferla

pittsburnslaw@gmail.com, pitts.jackb107393@notify.bestcase.com

Maria A Tsagaris on behalf of Creditor U.S. Bank Trust National Association, not in its individual capacity, but solely as Trustee of LSF10 Master Participation Trust
BankruptcyECFMail@mccallaraymer.com

Maria A Tsagaris on behalf of Creditor U.S. Bank Trust National Association, not in its individual capacity, but solely as Trustee of LSF9 Master Participation Trust
BankruptcyECFMail@mccallaraymer.com

Maria A Tsagaris on behalf of Creditor U.S. Bank Trust National Association, not in its individual capacity, but solely as Trustee of LSRMF MH Master Participation Trust II
BankruptcyECFMail@mccallaraymer.com

and, by US Mail, postage prepaid, to:

see Court Index 7 14 22

/s/ Jack D. Pitts
Jack D. Pitts